

Hon. Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COSMOS GRANITE (WEST), LLC, a
Washington limited liability company,

Plaintiff,

v.

MINAGREX CORPORATION, d/b/a MGX
Stone,

Defendant.

Case No. 2:19-cv-01697-RSM

**STIPULATED MOTION TO SEAL
DOCUMENT IN SUPPORT OF
PLAINTIFF’S OPPOSITION TO
DEFENDANT’S MOTION FOR
EXTENSION OF CERTAIN
DEADLINES**

**Noted on Motion Calendar:
August 11, 2021**

Pursuant to Local Civil Rule 5(g), Plaintiff, Cosmos Granite (West), LLC (“Cosmos”) and Defendant, Minagrex Corporation d/b/a/ MGX Stone (“Minagrex”) jointly request that the Court enter an order to Seal/Redact Exhibit 8 to the Declaration of Rachel S. Black in Support of Plaintiff’s Opposition to Defendant’s Motion for Extension of Certain Deadlines (“Black Decl.”). This exhibit, the July 16, 221 Supplemental Letter of expert Paul Pederson, contains confidential information, which Minagrex marked “HIGHLY CONFIDENTIAL – ATTORNEY EYES ONLY” pursuant to the Protective Order entered in this case. Plaintiff takes no position concerning the confidentiality of Exhibit 8.

Defendant’s position is that the designation of Exhibit 8 should be maintained to protect the legitimate private interests of Minagrex in accordance with the Stipulated Protective Order [Dkt. 16]. Exhibit 8 referenced contains previously nondisclosed sales and financial information. As such,

STIPULATED MOTION TO SEAL - I
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1 the information referenced satisfies Section 2.3 of the Stipulated Protective Order [Dkt. 16.]
2 Minagrex expects that the revelation of the information referenced in Exhibit 8 would prove
3 harmful to it. Finally, Minagrex believes that a less restrictive alternative is not sufficient to protect
4 the confidential information referenced because redaction of the same would substantively frustrate
5 the purpose of its admission.

6
7 Dated: July 11, 2021

By: /s/ Rachel S. Black

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18
19 Dated: July 11, 2021

By: /s/ Betsy A. Gillaspy (w/permission)

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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff conferred with counsel for Defendant in a telephonic meet and confer on July 9, 2021 (Chelsea Samuels and Walker Young participated), and counsel agreed that, per Minagrex's representations concerning the confidentiality of the documents at issue, a Stipulated Motion Seal was proper to protect the confidential information, and that there was no alternative to filing under seal.

/s/ Rachel S. Black

Rachel S. Black

ORDER

Based upon the foregoing and for good cause shown, the Court ORDERS that the Stipulated Motion to Seal/Redact is GRANTED.

DATED this 13th day of August, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Rachel S. Black
Rachel S. Black